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**U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT**

I. HEADING

DATE: 3 August 2003

SUBJECT: Sybill (a.k.a. SRS) PRP Removal Site, 111 Military Street, City of Detroit, Wayne County, Michigan

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POLREP # 1 (Initial) including photos of the site overview, Rouge River Site Investigation, City of Detroit sewer investigation, EPA site assessment, and DPD removal of stolen cars.

II. BACKGROUND

Site ID No.:	B54J
Response Authority:	CERCLA/OPA
NPL Status:	Not on NPL
State Notification:	Yes - State participated in assessment
Latitude/Longitude:	N 42°18.300', W 83°06.000'
Start Date:	July 25, 2003
Completion Date:	TBD

III. SITE INFORMATION

A. Incident Category

Potentially Responsible Party (PRP)-Removal Action of 250,000 gallons of used waste oil mixed with hazardous waste and 27,000 gallons of hazardous wastes including flammable, corrosive, and toxic substances in vandalized, leaking tanks, drums, small containers, and an ash pit.

B. Site Description and Background

The Sybill site address is 111 Military Road/Avenue in Detroit, Wayne County, Michigan. And is comprised of a process building (including boiler house), an office building, a small pump house, a water tower, two parking areas, and 26 ASTs (5 outdoor and 21 indoor) with a combined storage capacity of approximately 1,682,000 gallons. The nearest waterway is the Detroit River located approximately 0.5 miles southeast of the facility.

Background

Previously Sybill was a water treatment facility for the City of Detroit and later became a used oil processing plant for General Motors, Inc. (GM). Sybill purchased the site from GM in 1991. During Sybill's operation of the used oil processing facility, it was cited for various regulatory violations by the Detroit Water and Sewerage Department and Michigan Department of Environmental Quality (MDEQ).

June 2001, city-issued operating permits were revoked, and all utility services were terminated due to regulatory violations. The site continued to receive waste after the utilities had been disconnected. Stockpiling waste in on-site containers and tanks until the end of August 2001. It is believed that once the waste storage capacity of the facility was reached, Sybill management filed for bankruptcy and abandoned the facility. During operations, the facility was owned and operated by Mr. William Madius.

November 2001 - March 2002, GM and Rouge Steel Company conducted removal activities at the facility, removing and disposing of approximately 1.3 million gallons of low pH wastewater, oily wastewater and waste oil from tanks and containment areas.

May 2002, U.S. EPA investigated the site as part of an investigation into the River Rouge oil spill. Oil fingerprint analysis excluded Sybill as the cause of the River Rouge spill. However, conditions found during this investigation were observed to constitute a threat to human health and the environment, and led to an October 2002 site assessment.

October 2002, U.S. EPA, MDEQ and the City of Detroit conducted a level-B site assessment. The site assessment found drums of sodium hypochlorite, oxidizer, hexane, and flammable substances; tanks of acids and bases; and leaking tanks of used waste oil.

January 2003, due to the threats found during the assessment an emergency funding request for \$10,000 was verbally approved by the Region V Emergency Response Branch Chief. On January 9 and 10, U.S. EPA mobilized to the site to plug sewer drains and repair locks and fences. While mobilizing U.S. EPA discovered criminals engaged in stripping/chopping stolen vehicles on site. The Detroit City Police Department (DPD) was notified. The DPD removed the stolen cars but were unable to apprehend the criminals. The criminals were using blowtorches less than 10 feet from hazardous waste and used oil.

February 2003, the PRPs agreed to provide security for the facility while negotiating an Administrative Order on Consent (AOC). A technical team initiated work on a removal work plan.

July 2003, negotiations were completed and U.S. EPA signed an AOC with GM, Rouge Steel Company, Ford Motor Company, Detroit Diesel Corporation, and Sybill (a.k.a. SRS) Inc. Detroit DOT, LTV Steel, and Delphi did not sign the AOC. The City of Detroit cleaned, investigated, and plugged the sewers around the facility.

C. Description of Threat

The Sybill Site was abandoned with 250,000 gallons of used waste, 27,000 gallons of CERCLA hazardous substances, and numerous flammable and corrosive drums and cylinders remaining on site.

IV. RESPONSE INFORMATION

A. Situation

Current situation:

Altech Environmental, Connestoga Rovers and Associates, and Clean Waters (PRP contractors), began mobilizing to the Sybill Site as agreed upon in the AOC. Site setup and walkthrough will also occur during the week of August 4. Waste inventory and sampling are scheduled to begin on August 7. An on-site lab will arrive on August 11. 24 hour security will be provided for the duration of the project.

Site activities to date: (07/25/03 to 08/01/03)

July 25, 2003, PRP contractor personnel met on site for an initial project kickoff meeting and to commence mobilization.

July 28 - 30, 2003, PRP contractor mobilized equipment and generators to site.

B. Planned Removal Activities

1. Site Preparation
2. Compatibility Analysis
3. Waste Consolidation
4. Disposal Characterization Sampling
5. Waste Removal and Disposal
6. Removal-Action Close-out
7. Project Completion Report

C. Next Steps

1. Complete mobilization and site preparation.

D. Key Issues

PRP removal.

V. COST INFORMATION

Estimated site costs as of 07/25/03

	CEILING	COSTS
START	\$ 45,500	\$ 26,344
ER	\$ 10,000	\$ 7,500
U.S. EPA	\$ 8,000	\$ 5,500

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report is written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.